

EXHIBIT B

EXHIBIT A

Discovery the Sheriff's Office has agreed to provide plaintiffs:

1. All jail records of named plaintiffs and T.S., K.D., A.G., C.C., R.P., and A.C., including all electronic and hardcopy records; intake records; mental health records; education records; written decisions to deny or restrict education services; disciplinary paperwork, including appeals of disciplinary sanctions and the responses of jail officials to appeals; and any complaints regarding solitary confinement or education, including grievances, responses to administrative segregation notices, and all replies by jail officials to such complaints.
2. A spreadsheet extracted from the Onondaga County Justice Center's electronic record system for juveniles admitted to the Justice Center between October 2015 and the present including the following data: ICN, date of birth (month/year), admissions date, discharge date, designation, race, and sex.
3. A list of all named plaintiffs subjected to discipline between October 2015 and the present, including ICN; sex; date discipline was imposed; type of discipline imposed; reason discipline was imposed; discipline begin date; discipline end date; days served; and any remarks relating to the discipline.
4. Access to the Onondaga County Justice Center on October 31 and November 3 to plaintiffs' correctional experts to conduct tours and engage in confidential interviews of plaintiffs.
5. Access to the Onondaga County Justice Center on October 31 to plaintiffs' photographer to take photos of all areas in which juveniles are housed, including 5BSH2, 5BSH3, 5C, recreation cages, and 2A.